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August 12, 2015

By ECF

The Honorable P. Kevin Castel,
United States District Court,
Southern District of New York,
Daniel Patrick Moynihan Courthouse,
500 Pearl Street,
New York, New York 10007.

Re: Sullivan v. Barclays PLC et al., No. 13-CV-2811

Dear Judge Castel:

We write on behalf of Defendants Barclays plc, Barclays Bank plc, and Barclays Capital Inc. (together, the “Barclays Defendants”) and the named Plaintiffs in the above-referenced action in furtherance of their August 5, 2015 request that the Court enter a Stipulation and Proposed Protective Order Governing Materials Produced by the Barclays Defendants (the “Proposed Order”). (ECF No. 166.) After conferring with the other defendants in this action, the Barclays Defendants and Plaintiffs have agreed to several minor modifications to the Proposed Order to accommodate requests made by the other defendants. Those modifications are reflected in the enclosed modified Proposed Order. For the Court’s convenience, also enclosed is a redline showing the changes made to the previously submitted Proposed Order.

Accordingly, for the reasons set forth in our August 5, 2015 letter, and pursuant to Rule 26(c) of the Federal Rules of Civil Procedure and for good cause, the Barclays Defendants and Plaintiffs jointly request that the Court enter the enclosed modified Protective Order.

Respectfully submitted,
/s/ Matthew J. Porpora

(Enclosures)

cc: All Counsel of Record